

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) JOSHUA FIELDS)	
)	
Plaintiff,)	
)	
v.)	21-cv-00986-G
)	
(1) GREAT LAKES INSURANCE SE,)	<i>Removed from the District Court of</i>
)	<i>Kay County, State of</i>
(2) MJ KELLY COMPANY, and)	<i>Oklahoma, Case No. CJ-2021-00037</i>
)	
(3) CAPSTONE ISG,)	
)	
Defendants.)	

**DEFENDANT GREAT LAKES INSURANCE SE'S FIRST SET OF DISCOVERY TO
PLAINTIFF JOSHUA FIELDS**

TO: Plaintiff Joshua Fields
c/o Counsel

Defendant Great Lakes Insurance SE ("Great Lakes") hereby propounds the following Interrogatories, Requests for Production, and Requests for Admissions (these "Discovery Requests") to Plaintiff Joshua Fields ("Plaintiff"), which Plaintiff shall answer, under oath, and with particularity and detail, pursuant to Fed. R. Civ. P. 26, 33, 34, and 36. Plaintiff's answers and responses to each of these Discovery Requests are due within thirty (30) days from the receipt thereof, to be delivered to the offices of Doerner, Saunders, Daniel & Anderson, L.L.P., c/o Michael Linscott, Sara Potts, and Emily Allan, 210 Park Avenue, Suite 1200, Oklahoma City, Oklahoma 73102. Further, these Discovery Requests shall be deemed continuing and any information pertinent to these Discovery Requests which becomes available to Plaintiff after submission of his answers and responses shall be immediately forwarded in further supplements, pursuant to Fed. R. Civ. P. 26 (e).

Reply - Exhibit 1

of Kay County, Oklahoma, and made an exhibit to the Notice of Removal in this removed action, Dkt. #1-1.

17. The “**Lawsuit**” when used herein, refers to the above-styled lawsuit, *Joshua Fields v. Great Lakes Ins. SE*, 21-cv-00986-G (W.D. Okla.) (removed from Kay County District Court, CJ-2021-37).

FIRST SET OF INTERROGATORIES

Note: If you claim a privilege of any type pertaining to these Interrogatories, you are required to create and produce a “Privilege Log,” pursuant to Fed. R. Civ. P. 26(b)(5).

INTERROGATORY NO. 1: Identify each person, exclusive of counsel, who provided, or assisted with formulating, any part of your answers to these Interrogatories, identifying in your answer which specific Interrogatory to which each person contributed.

INTERROGATORY NO. 2: Identify, by full name, last known address, last known telephone number, and last known email address, each and every person known to you or to your attorney(s) to have information relating to the facts or allegations in your Petition or in any way relating to this Lawsuit, and for each person identified, provide a detailed summary of the factual information you believe each person possesses.

INTERROGATORY NO. 3: Identify each and every person you expect to provide expert testimony at trial by providing the following information for each expert:

- (a) Educational background and work history;
- (b) all publications authored in the previous ten (10) years;
- (c) the matters in this litigation that each expert on which each expert is expected to opine;
- (d) the factual basis underlying each opinion; and,
- (e) the amount of compensation paid to each expert.

(f) a list of all cases each expert has testified as an expert at trial or deposition in the last four years.

NOTE: Answering this Interrogatory does not absolve Plaintiff of the duty to provide expert disclosures in accordance with Fed. R. Civ. P. 26(a)(2), or pursuant to the Court's Scheduling Order.

INTERROGATORY NO. 4: Identify, by carrier, policy number, policy limits, and date(s) of coverage, any and all insurance policies that were in effect for the Property on March 25, 2020, regardless of whether such polic(ies) were purchased by you or anyone else and regardless of whether such polic(ies) are still in effect.

INTERROGATORY NO. 5: Provide the following information as to each type(s) or category of damage you seek to recover in this lawsuit:

- a. A detailed description of each and every injury, loss, cost, expense, or element of damage you claim to have sustained by reason of the allegations in your claims against Great Lakes;
- b. The dollar amount for each type of injury, loss, or element of damage you seek to recover; and,
- c. A complete description of the source or method/calculation you utilized in determining each of these damage amounts.

NOTE: Answering this Interrogatory does not obviate your duty to provide and/or supplement your Initial Disclosures with meaningful calculations of damages, as required under Fed. R. Civ. P. 26.

INTERROGATORY NO. 6: For any of the policies you identified in Interrogatory No. 4, above, state whether you have filed any other claims for loss relating to the 2020 fire (other than

REQUEST FOR ADMISSION NO. 5: Admit you did not report to Great Lakes that you had removed the smoke detectors and fire extinguishers from the Building in February 2020.

Respectfully submitted,



DOERNER SAUNDERS DANIEL
& ANDERSON, LLP

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***Attorneys for Defendants Great Lakes Insurance
SE and Capstone ISG***

CERTIFICATE OF SERVICE

This certifies that on January 31, 2022, a true and correct copy of the foregoing document was served via the Court's electronic notification system, electronic mail, and/or U.S. Mail, postage prepaid:

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